

Wagon County 04-01-01
Bryant

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CITY OF CHICOPEE, Acting through the
Chicopee Public Schools,

Plaintiff,

v.

DAVID T. As Parent and next friend of
Kaitlyn T. and MASSACHUSETTS
DEPARTMENT OF EDUCATION,

Defendants.

CIVIL ACTION NO. 04-30087-MAP

**JOINT MOTION TO IMPOUND ADMINISTRATIVE RECORD INCLUDING
TRANSCRIPT AND NAME AND IDENTITY OF STUDENT AND HER FATHER
AND FOR OTHER RELIEF**

All parties – by and through their respective counsel of record – jointly move, pursuant to LR. 7.2, that this Court (1) impound until further order of the Court the record, including the transcript, of the administrative proceedings under review in this action; (2) impound until further order of the Court the name and identity of the student and her father.

As grounds therefor, the parties state the following:

1. The record of the administrative proceedings under contains, among other things, academic and psychological records pertaining to the student.

2. The purpose of this motion is to ensure the confidentiality of the student and her father and to ensure that the student and her father are spared any mental aggravation, embarrassment, or harm associated with this matter.

CONCLUSION

Wherefore, the parties respectfully request that this Court allow this motion.

Respectfully submitted,

CITY OF CHICOPEE, Acting through the
Chicopee Public Schools

By its attorney,

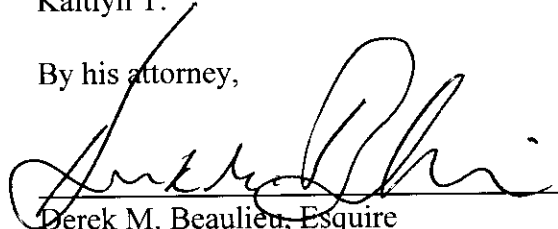


Claire L. Thompson, Esquire
Doherty, Wallace, Pillsbury
& Murphy, P.C.
One Monarch Place
1414 Main Street, 19th Floor
Springfield, MA 01144
(413) 733-3111 (telephone no.)
(413) 734-3910 (facsimile no.)
B.B.O. No. 550262

Respectfully submitted,

DAVID T. As Parent and next friend of
Kaitlyn T.

By his attorney,



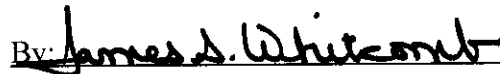
Derek M. Beaulieu, Esquire
1242 Main Street, Suite 306
Springfield, MA 01103
(413) 733-1824 (telephone no.)
(413) 567-7746 (facsimile no.)
B.B.O. No. 644185

Respectfully submitted,

MASSACHUSETTS DEPARTMENT
OF EDUCATION

By its attorney,

THOMAS F. REILLY
ATTORNEY GENERAL



James S. Whitcomb
Assistant Attorney General
Western Massachusetts Division
1350 Main Street
Springfield, MA 01103-1629
(413) 784-1240, ext. 113 (telephone)
(413) 784-1244 (facsimile)
B.B.O. No. 557768

DATED: August 4, 2004.